

I. HEADING

TE: 24 FEBRUARY, 1992
BJECT: HILLSDALE DRUM SITE
HILLSDALE, ST. HELENA PARISH, LA
FROM: MIKE RYAN, P.E., OSC
EPA REGION 6 ERB
TO: DIRECTOR, ERD
REGION 6
POLREP#: NO. 1

II. BACKGROUND

SITE#: 2X DELIVERY ORDER#:
RESPONSE AUTHORITY: CERCLA
ERNS#: N/A
NPL STATUS: NON-NPL
STATE NOTIFICATION: STATE REFERREL
ACTION MEMO STATUS: UNDER PREPARATION
START DATE: 02/14/92
DEMOBILIZATION DATE: N/A
COMPLETION DATE: N/A

III. SITE INFORMATION

A. INCIDENT CATEGORYCERCLA

INCIDENT CATEGORY: Active Waste Management Facility.

B. SITE DESCRIPTION

1. Site Description

The Hillsdale Drum Site is composed of three separate subsites, all operated and/or managed by the same companies and individuals. These subsites have been labeled as Site A, Site B, and Site C. The Hillsdale Drum Site (Site B) is located at Rural Route 1, Box 87, Amite, Louisiana, 70422. The site is on Louisiana State Road 441, approximately 3/4 mile south of the town of Hillsdale (population approximately 150). There are two residences approximately 1/4 to 1/2 mile north of the site along SH 441. Land use surrounding the site is primarily rural, with cattle raised for dairy and beef production. The P.J. Thomas Road site (Site A) is located on P.J. Thomas Road, approximately 1/2 mile east of La SH 1045, approximately 1 1/2 miles south of Hillsdale. The site is approximately 100 yards off the road and 75 yards north of a house trailer residence. There is a second residence approximately 250 yards to the southwest and separated from the site by a heavy grove of trees. There is no actual street address for this site. There is a small lake/cattle tank/pond located approximately 100 yards northwest of the site. This water body is used for fishing by local residents and eventually drains to the Amite River. The warehouse site (Site C) is located



on Laurel Avenue in the City of Amite. The warehouse is located in the southwestern portion of the city. There are 10 residences within 1/4 mile of the warehouse. Surrounding the warehouse are other warehouses and a railroad track.

2. Description of Threat

The substances known on-site are hazardous substances as defined by Section 101(14) of CERCLA. Known substances in drums in the lounge/warehouse building (Site B) are acetone (flammable liquid), fuming sulfuric acid (corrosive), metallic sodium (flammable solid), and lab packs containing metaphosphoric acid, nitric acid, hydrochloric acid, hydrofluoric acid, sodium hydroxide, drums marked as containing PCBs, and a two labpacks marked as containing biological hazards (medical wastes). At the site on J.P. Thomas Road (Site A), the pile of containers next to the burn pile contained several containers of restricted use pesticides and experimental pesticides with warning labels indicating that the pesticides were cholinesterase inhibitors. In the Amite warehouse (Site C) were two leaking fiber drums, one labeled Poison B Liquid and another labeled Corrosive Liquid. Additionally, there were several empty "glove bags" marked with "asbestos containing material" labels, and a pile of an unknown white powdery material and vermiculite mixed together. Additionally, there was one drum marked as containing waste formaldehyde. From evidence gathered, it appears that individuals

in the company would bring certain of the drums to the site(s), unpack the labpack drums, combine materials from the labpacks together and take the combined materials for disposal. Current information suggests that once the containers had been emptied, the hazardous waste labels would be painted over to obscure the labels. Investigations have also discovered that some of the materials from the labpacks were allegedly emptied onto the burn pile and ignited. This appears especially true for certain flammable substances. Once the glass containers of flammable and/or hazardous materials were emptied, it appears the glass containers would be broken and dumped into other empty drums. Allegedly, these drums would be relabeled with nonhazardous waste labels. The major potential for future release from Site B is through fire/explosion. Presently, the drums are being restaged, according to compatibility class, within the lounge/warehouse (Site B). Those drums which appear to be in poor condition or in danger of leaking are being overpacked into either metal or poly overpack drums according to the type of material being overpacked. If there were to be a fire/explosion, the fumes and smoke created by the fire would likely be toxic and tend to drift with the prevailing winds over the town of Hillsdale. Contingency plans have been made with both the St. Helena Sheriff's Department and the Hillsdale Volunteer Fire Department for evacuation and fire fighting operations in the event of a fire/explosion.

C. PRELIMINARY ASSESSMENT RESULTS

On February 12, 1992 the EPA Region 6 Emergency Response Branch received a request for assistance from the Louisiana Department of Environmental Quality (LDEQ) concerning the improper storage of a number of drums at two locations near Hillsdale, St. Helena Parish, Louisiana. The manner of storage of the drums posed a significant fire and explosion threat. Drums of incompatible materials were stored next to each other, i.e. drums labeled oxidizers were stored next to drums with flammable liquids labels, drums with corrosives labels were stored next to drums with poisons labels, etc. Because of the potential for fire and explosion, the LDEQ had requested that the St. Helena Sheriff evacuate a family living in a house trailer approximately 75 yards from one of the storage locations. EPA, EPA Technical Assistance Team (EPA-TAT), the Louisiana State Police, and LDEQ investigated Sites A and B on February 13, 1992. At the site on J.P. Thomas Road (Site A) there were approximately 200 drums, both metal 55-gallon and 40-gallon fiber overpack drums stored outside a 40-foot van trailer. There were approximately 75 drums inside the van trailer. On the ground near the trailer were two piles of what appeared to be vermiculite packing material from the fiber laboratory overpack drums. There was also a pile of ash where it appeared that a number of drums had been burned (evidenced by the metal drum rings). The burn pile also had a number of partially-burned test tube and centrifuge vials in the ashes at the foot of the pile. Near the burn pile was a pile of numerous small containers which had hazardous materials labels, i.e. poison, flammable liquid, restricted-use pesticide, experimental pesticide, corrosive. The investigation team also investigated a site on LA 441, which was located in an abandoned

tavern/nightclub (Site B). This location had approximately 500 drums and containers stored inside the building and another 15 drums stored outside behind the building. The drums inside had numerous hazardous materials labels and preliminary information obtained from LDEQ indicated that several of the drums contained corrosive materials (pH <1). The drums in the building were stored in a haphazard fashion with apparent disregard for compatibility class. There is also a 40-foot van trailer on-site with an unknown number of drums stored inside. Behind the building there is a fenced oxidation pond (for the facility septic system) containing a number of broken laboratory reagent bottles and indications of materials having been dumped and burned. When the investigation team arrived at Site B, the Louisiana State Police had impounded a truck operated by the potentially responsible party with a number of drums labeled polychlorinated biphenyls (PCBs) inside. These drums had been initially stored at Site B and had been sent to a disposal facility which had returned the drums because the facility was not permitted to dispose of PCBs. On February 17, 1992, the Louisiana State Police informed the OSC of a third site in a warehouse in Amite, Tangipahoa Parish, Louisiana (Site C). This site had 31 drums of the same type and markings as at the other

two sites, a pile of vermiculite packing material, and several plastic bags with "asbestos containing material" labels. Two 40-gallon fiber labpack drums, one with "Poison B Liquid, N.O.S." and the other with "Corrosive Liquid, N.O.S." were discovered leaking. Key problem areas are the improper storage of numerous drums of hazardous materials, with incompatible materials being stored in close proximity; leaking drums of hazardous materials; fire and explosion threat; and potential improper disposal of hazardous materials. The site has not had any other site assessments or investigations performed under Superfund authority. The Hillsdale Drum site allegedly results from the activities of four companies, Southern Environmental Services, PSC Environmental Services, Tecrep, Inc., and LabTech, Inc. These companies were licensed transporters of hazardous materials. From information gathered in the investigation, the companies apparently collected hazardous wastes from different contractors for transport of the materials for disposal. Materials which could not be disposed of were apparently stored in the van trailers or in the lounge/warehouse.

IV. RESPONSE INFORMATION

A. PLANNED REMOVAL ACTIONS

The proposed actions are as follows: evacuate and temporarily relocate the family living in the house trailer near the J.P. Thomas Road Site (Site A); remove and restage all drums, the 40-foot van trailer, and the piles of ashes, soil, and debris from the J.P. Thomas Road site (Site A) to the La Hwy 441 site (Site B); restage and inventory all drums in the La Hwy 441 site (Site B); remove and restage all drums and debris from the Amite warehouse site (Site C) to the La Hwy 441 site (Site B); provide site security through both fencing and 24-hour armed security (Site B); HazCat each drum; sample and analyze selected drums in support of technical and enforcement activities; obtain sample profile and analysis for disposal options; and sample and analyze for priority

pollutants soil samples from the J.P. Thomas Road site (Site A), from the pond north of Site A, and from drainage pathways to determine potential offsite migration. Before the full nature of the contents of the drums and the extent of potential contamination are known, HazCat sampling and analysis of drum contents must be completed. It is anticipated that this process will continue for at least 30 days.

B. SITUATION

1. Current Situation As stated above, the EPA Emergency Response Branch received notification of the site(s) and a request for assistance from the Louisiana Department of Environmental Quality on February 12, 1992, and initiated an investigation and site assessment on February 13, 1992. On February 13, 1992, representatives of the Emergency Response Branch and the Director

of the Environmental Services Division met with the Regional Administrator and received verbal approval of a Classic Emergency Removal Action ceiling of \$100,000. On February 14, 1992, the ERCS contractor was mobilized on-site to begin removal activities at the J.P. Thomas Road Site (Site A) and at the La Hwy 441 site (Site B). These activities were limited to repacking and restaging drums to the La Hwy 441 site (Site B), and providing 24-hour security to both sites. On February 17, 1992, the ERCS contractor was mobilized to provide site security and overpack/restage the drums and materials discovered in the Amite warehouse (Site C) to the La Hwy 441 site (Site B). Additionally, temporary relocation of one family who lived near the J.P. Thomas Road site (Site A) was accomplished. At the Amite warehouse site (Site C), the drums were removed and the floor swept to remove contaminants. No other contaminants are apparent at this site. Following the removal of the trailer, drums and containers, ash pile and vermiculite piles from Site A to Site B, samples were collected of the soil and sent for analysis. Approximately three inches of soil from under the ash pile was removed in an attempt to eliminate surface soil contamination. A fence was constructed around the site of the ash pile to prevent unauthorized access and potential direct contact exposure to contaminants which may remain in the soil. Dependent upon the analytical results of the soil sampling, future surface and subsurface sampling and removal of contaminated soil may be required.

2. Removal Actions

to Date Based upon the judgement of the OSC, the most prudent initial action was to restage all drums and materials from the three sites to the warehouse/lounge at Site B. Factors considered include: large inside storage capacity available at Site B; water reactive materials; fiber drums containing incompatible materials; adverse weather conditions; and site security. Currently drums in the La Hwy 441 site (Site B) are being restaged according to compatibility class. Each drum is being individually sampled and a hazard categorization (HazCat) test is being performed on each sample. A select number of samples are being drawn for full priority pollutant analysis at a contacted laboratory (QA 2 with CLP data package for data evaluation). The trailer which was restaged from the J.P. Thomas Road site (Site A) to the La Hwy 441 site (Site B) is being unloaded and the drums staged in the lounge/warehouse. Current

actions are being restricted to site/drum stabilization, proper staging and sampling.

3. State and Local Actions to Date

The Louisiana Department of Environmental Quality was notified of the site by an anonymous caller on February 5, 1992. LDEQ and the State Police started investigations of the J.P. Thomas Road site (Site A) and the La Hwy 441 site (Site B) on

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February 6, 1992. Initial investigations of the site(s) indicated the presence of incompatible materials stored next to each other presenting a fire and explosion hazard. LDEQ requested EPA assistance on February 12, 1992. At the same time, LDEQ requested that the Governor of Louisiana issue a notice of imminent endangerment. Once the Governor of Louisiana issued the notice, the LDEQ instructed the St. Helena Sheriff's Office to evacuate the family living near the J.P. Thomas Road site (SITE A). The LDEQ is continuing investigations of the activities at all locations under state RCRA authority. The Louisiana State Police obtained search warrants and issued several arrest warrants in conjunction with their criminal investigation of the case. Entry into the two initial sites (Sites A & B) was made under the State Police Search Warrant authority, and entry into the Amite warehouse site (Site C) was made under a "Consent to Search" agreement. Due to the multi-state nature of the potential criminal investigations, the Louisiana State Police has requested assistance from EPA CID.

4. Potential for Continued State/Local Response

The LDEQ and State Police will be continuing their respective investigations. EPA has assumed the lead in the removal action; however, data collected from both HazCat analysis and full priority pollutant scan analysis will be shared by all parties involved. LDEQ and State Police representatives are remaining on-site during all investigative activities. The St. Helena Sheriff's Office is providing 24-hour site security and assisted EPA and ERCS in obtaining rapid electrical and water connections.

C. NEXT STEPS

Continue sampling and HazCattling of each drum, and staging drums according to compatibility class. Return evacuated/relocated family to their residence. Maintain 24-hour site security. Send samples from selected drums for analysis.

D. KEY ISSUES

EPA Office of Regional Counsel is preparing a Unilateral Administrative Order for site access, since State search warrant authority will expire in the next few days. Action Memorandum has been drafted and signature expected promptly.

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V. COST INFORMATION

Cost To Date

Cleanup Contractor	\$ 61,620.00
TAT	N/A
CLP Analytical Services	N/A
REAC	N/A
Regional Laboratory Services	N/A
IAGS	N/A
Intramural	N/A
Letter Contracts	N/A
Total	\$ 61,620.00
Project Ceiling	\$100,000.00
Percent of Project Funds Remaining	38.38%VI.

DISPOSITION OF WASTES

Not Applicable. Waste streams as yet unidentified. This action does not address disposal of wastes.

Distribution:

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